

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE**

JOAN ANZIANI,

Plaintiff

v.

WENTWORTH BY THE SEA, LLC,

Defendant

Civil Action

Case No. 1:18-cv-855-PB

DEFENDANT'S CONSENTED-TO MOTION FOR PROTECTIVE ORDER

Pursuant to Fed. R. Civ. P. 26 (c) and Local Rule 26. 2, Defendant Wentworth By The Sea, LLC moves this Court to enter the attached Protective Order, which conforms to Civil Form 5, as an Order of this Court.

The parties to this action, by and through their respective counsel, acknowledge that the parties possess confidential, competitive, and/or proprietary information that will be revealed in discovery and subsequently form a part of the record in this case. Acknowledging the need for and desire that such information be protected, the parties and their respective counsel have agreed to the terms, conditions, and obligations in the attached Protective Order to assure the protection and confidentiality of said competitive, confidential, and proprietary information and trade secrets in the possession of the parties.

WHEREFORE, Defendant Wentworth By The Sea, LLC respectfully requests that this Court grant its Motion and enter the attached Protective Order as an Order of this Court.

Date: August 19, 2019

Respectfully submitted,
WENTWORTH BY THE SEA, LLC
By Its Attorney

/s/ Elizabeth A. Germani
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CERTIFICATE OF SERVICE

I hereby certify that on August 19, 2019, I electronically filed the foregoing Consented-To Motion for Protective Order via the Court's CM/ECF system, which will send electronic notification of such filing to David P. Angueira, Esq., Alan L. Cantor, Esq., and David W. Faraci, Esq., counsel for Plaintiff.

Dated: August 19, 2019

/s/ Elizabeth A. Germani
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